UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA HARRISBURG DIVISION

In re:) CASE NO. 1:18-bk-00139-HWV) JUDGE Henry W. Van Eck
Natasha Marie Miller	
Debtor.)
)
)

NATIONSTAR MORTGAGE LLC d/b/a MR. COOPER'S NOTICE OF DEBTOR'S REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC

Now comes Creditor Nationstar Mortgage LLC d/b/a Mr. Cooper ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 6 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 04/01/2020 through 09/01/2020. Creditor holds a secured interest in real property commonly known as 1630 Matthew Dr. York, Pennsylvania 17404 as evidenced by claim number 7 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 10/01/2020 and will

be required to cure the delinquency created by the forbearance period (hereinafter "forbearance

arrears"). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding

the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor

fails to make arrangements to fully cure the forbearance arrears, Creditor reserves it rights to seek

relief from the automatic stay upon expiration of the forbearance period.

Robertson, Anschutz, Schneid & Crane LLC Authorized Agent for Secured Creditor 10700 Abbott's Bridge Road, Suite 170

Duluth, GA 30097

Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab Charles G. Wohlrab, Esquire

Email: cwohlrab@rascrane.com

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CERTIFICATE OF SERVICE

I certify that I caused a true and accurate copy of the foregoing *Notice of Debtor's* Request for Forbearance to be served upon the following parties in the following fashion on this 19th day of May 2020.:

Natasha Marie Miller 1630 Matthew Dr York, PA 17404

And via electronic mail to:

Keith B DeArmond 2951 Whiteford Road, Suite101 York, PA 17402 717-885-0937

Charles J DeHart, III 8125 Adams Drive, Suite A Hummelstown, PA 17036

United States Trustee 228 Walnut Street, Suite 1190 Harrisburg, PA 17101

> Robertson, Anschutz, Schneid & Crane LLC Authorized Agent for Secured Creditor 10700 Abbott's Bridge Road, Suite 170 Duluth, GA 30097 Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab Charles G. Wohlrab, Esquire Email: cwohlrab@rascrane.com